

June 27, 2005

Ms. Pang Mueller  
Permitting and Compliance Manager  
South Coast AQMD  
21865 E. Copley Drive  
Diamond Bar, CA 91765-4182

Subject: Draft Permit and Engineering Evaluation for the Inland Empire Energy Center  
Project (Facility ID 129816)

Dear Ms. Mueller:

On behalf of Inland Empire Energy Center LLC, we are pleased to provide the following comments on the District's May 13, 2005 preliminary determination for the proposed Inland Empire Energy Center (IEEC). To help clarify our comments, we have included a marked-up version of the District's engineering evaluation in a strike-through/underlined format. In the following paragraphs we discuss these comments in more detail.

#### NSPS NOx Limit for Gas Turbines

##### Sections Affected:

- Equipment Description for Units D1 and D2
- Appendix F

##### Discussion of Issue

We propose to revise the NOx NSPS limit for the gas turbines from 180 to 123 ppmv. This NOx limit change occurs as a result of recognizing the different NSPS calculations associated with a combined-cycle heat rate and a gas turbine-only heat rate. A gas turbine-only heat rate was used because the "affected facility" in the gas turbine NSPS (40 CFR 60 Subpart GG) is only the gas turbine portion of a combined cycle system.

34794

<b>DOCKET</b> 01-AFC-17
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**PICTURE(S)** # \_\_\_\_\_

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For more information contact:

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